

**GREGORY L. SILVERMAN, ESQ., P.C.**

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May 19, 2023

**VIA CM/ECF ONLY**

Hon. Mark W. Pedersen  
100 State Street  
Rochester, NY 14614  
pedersen@nywd.uscourts.gov

**RE: Jason Wemes v. The Canandaigua National Bank & Trust Company;  
Case No.: 6:22-cv-06297 (DGL) (MWP)**

**SUBJECT: Consent Request for Adjournment of Discovery Deadlines**

Dear Magistrate Judge Pedersen:

I write on behalf of Plaintiff Jason Wemes, with the consent of counsel for Defendant, to request an enlargement of time to complete discovery. The parties have propounded and responded to written discovery, and are in the process of attempting to resolve currently-informal discovery issues before certain depositions are held.

No prior extensions of time have been previously granted. The parties seek to extend the various deadlines in the initial Scheduling Order (Dkt. No. 11) by four (4) months as follows:

<b>Deadlines</b>	<b>Initial deadlines</b>	<b>Proposed deadlines</b>
Factual discovery	June 2, 2023	<b>October 6, 2023</b>
Motions to compel discovery	July 1, 2023	<b>November 3, 2023</b>
Motions to join other parties and to amend the pleadings	July 7, 2023	<b>November 10, 2024</b>
Plaintiff's identification of expert witnesses and provision of reports	August 5, 2023	<b>December 8, 2024</b>
Defendant's identification of expert witnesses and provision of reports	September 5, 2023	<b>January 5, 2024</b>
Plaintiff's identification of rebuttal experts and provision of reports	October 5, 2023	<b>February 9, 2024</b>
All discovery relating to experts, including depositions	November 7, 2023	<b>March 8, 2024</b>
Dispositive motions	January 13, 2024	<b>May 17, 2024</b>

Thank you for your consideration of this request.

SO ORDERED.



Mark W. Pedersen  
U.S. Magistrate Judge  
May 31, 2023, Rochester, NY

Sincerely,



Gregory L. Silverman